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Attorneys for Defendants

Louisa Ayrapetyan; Natalie Leonard; Leah Wilson; Brandon Stallings; Ruben Duran;  
Hailyn Chen; Audrey Ching; Melanie Shelby; Arnold Sowell, Jr.; Mark Toney; Paul  
Kramer; Jean Krasilnikoff; Ellin Davtyan; George Cardona; Devan McFarland; Enrique  
Zuniga

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

TODD R.G. HILL,

Plaintiff,

v.

THE BOARD OF DIRECTORS,  
OFFICERS AND AGENTS AND  
INDIVIDUALS OF THE PEOPLES  
COLLEGE OF LAW, et al.,

Defendants.

Case No.: 2:23-cv-01298-CV (BFM)

**STATE BAR DEFENDANTS'  
RESPONSE TO PLAINTIFF'S  
NOTICE OF NON-ENGAGEMENT**

MAGISTRATE JUDGE: Hon. Brianna Fuller  
Mircheff

DISTRICT JUDGE: Hon. Cynthia  
Valenzuela

1 In Plaintiff's Notice of Non-Engagement" ("Notice"), Plaintiff alleges the State  
2 Bar Defendants have refused to conduct conferences with him under Federal Rule of  
3 Civil Procedure 26(f) and Local Rule 16-2 and requests that the Court consider imposing  
4 sanctions against all defendants for their "continued bad-faith litigation conduct."<sup>1</sup> See  
5 Dkt. 209. Plaintiff's Notice suffers from numerous defects and should be summarily  
6 denied.

7 1. As an initial matter, Plaintiff argues that the State Bar Defendants, as well as  
8 other defendants in this action, have refused to conduct conferences with him under  
9 Federal Rule of Civil Procedure 26(f) and Local Rule 16-2. See generally Dkt. 209.  
10 Plaintiff thus appears to interpret this Court's Reassignment Order (Dkt. 205) as requiring  
11 the parties to engage in either a discovery or pretrial conference. The State Bar  
12 Defendants disagree with Plaintiff's interpretation of this Court's Reassignment Order,  
13 which orders the parties to file Case Management Statements and permits them to file  
14 separate statements "if any party is proceeding without counsel." See Dkt. 205 at 3–4. As  
15 set forth in Plaintiff's own exhibits to the Notice, counsel for the State Bar Defendants  
16 explained to Plaintiff in an email on February 10, 2025 that there was no need to meet  
17 and confer before filing Case Management Statements, as the Reassignment Order  
18 permits parties to file separate statements where, as here, a party is proceeding pro se. See  
19 Notice, Ex. B. However, rather than responding to counsel's email, Plaintiff proceeded to  
20 file his Notice on the very same day. *Id.*

21 The State Bar Defendants do not interpret this Court's Reassignment Order as  
22 requiring the parties to engage in either discovery or pre-trial conferences. Nor do the  
23 State Bar Defendants interpret the Reassignment Order as permitting the parties to  
24 engage in discovery. See Dkt. 215 (Civil Standing Order) at 6–7 (stating that as a general  
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26 <sup>1</sup> The State Bar Defendants are Defendants Louisa Ayrapetyan, Natalie Leonard, Leah  
27 Wilson, Brandon Stallings, Ruben Duran, Hailyn Chen, Audrey Ching, Melanie Shelby,  
28 Arnold Sowell, Jr., Mark Toney, Paul Kramer, Jean Krasilnikoff, Ellin Davtyan, George Cardona, Devan McFarland, and Enrique Zuniga.

1 matter, parties should begin to propound discovery before a Scheduling Conference  
2 “[u]nless there is a likelihood that, upon motion by a party, the Court would order that  
3 discovery be stayed”). Where, as here, the Magistrate Judge has already recommended  
4 that all of Plaintiff’s claims against the State Bar Defendants be dismissed without leave  
5 to amend and the State Bar Defendants be dismissed with prejudice from this suit (*see*  
6 Dkt. 213 at 31–32), the State Bar Defendants submit that discovery should not be  
7 permitted until the pleadings are settled.

8 2. Finally, to the extent that Plaintiff seeks sanctions from the State Bar  
9 Defendants, Plaintiff has failed to identify any sanctionable conduct, much less filed a  
10 properly noticed motion seeking such relief. Plaintiff simply argues that the State Bar  
11 Defendants have failed to conduct conferences that are not required by the plain text of  
12 the Reassignment Order. *See* Notice at 3, 11–18; Dkt. 205. Although the Court may  
13 impose sanctions in various situations, including where a party has failed to comply with  
14 an order or the Local Rules (*see, e.g.*, L.R. 83-7), Plaintiff has identified no sanctionable  
15 conduct here by the State Bar Defendants. Accordingly, Plaintiff’s request for sanctions  
16 should be summarily denied.

17 \* \* \*

18 Plaintiff’s Notice is baseless and purports to seek sanctions against the State Bar  
19 Defendants based on non-existent “bad-faith litigation conduct.” In addition to opposing  
20 the Notice, the State Bar Defendants request that the Court issue an order clarifying that:  
21 (1) the Reassignment Order does not require the parties to engage in discovery  
22 conferences under Rule 26(f) or pre-trial conferences under Local Rule 16-2; and (2) the  
23 Reassignment Order does not require or permit the parties to engage in discovery at this  
24 juncture.

25  
26 Dated: February 21, 2025

Respectfully submitted,

27 By: /s/ JENNIFER KO  
28 JENNIFER KO

Assistant General Counsel

Attorneys for Defendants  
Louisa Ayrapetyan; Natalie Leonard;  
Leah Wilson; Brandon Stallings; Ruben  
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Krasilnikoff; Ellin Davtyan; George  
Cardona; Devan McFarland; Enrique  
Zuniga

**DECLARATION OF SERVICE**

I, Ryan Sullivan, hereby declare: that I am over the age of eighteen years and am not a party to the within above-entitled action, that I am employed in the City and County of San Francisco, that my business address is The State Bar of California, 180 Howard Street, San Francisco, CA 94105. On February 21, 2025, following ordinary business practice, I filed via the United States District Court, Central District of California electronic case filing system, the following:

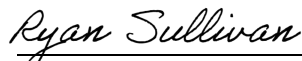
**STATE BAR DEFENDANTS' RESPONSE TO PLAINTIFF'S NOTICE OF NON-ENGAGEMENT**

Participants in the case who are registered CM/ECF users will be served.

*See the CM/ECF service list.*

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed at San Francisco, California, on February 21, 2025.

  
Ryan Sullivan